

**ENTERED**

May 27, 2025

Nathan Ochsner, Clerk

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	
	§	<b>Case No. 22-60043</b>
<b>FREE SPEECH SYSTEMS LLC,</b>	§	
	§	
<b>Debtor.</b>	§	
	§	
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<b>Neil Heslin and Scarlett Lewis,</b>	§	
<b>Plaintiffs,</b>	§	
	§	
<b>v.</b>	§	<b>Adv. No. 24-03228</b>
	§	
<b>Christopher R. Murray, Alex E.</b>	§	
<b>Jones Free Speech Systems, LLC,</b>	§	
<b>and Cadence Bank,</b>	§	
<b>Defendants.</b>	§	

**STIPULATION AND AGREED ORDER REGARDING REMAND**

WHEREAS, on June 21, 2024, Plaintiffs Neil Heslin (“Heslin”) and Scarlett Lewis (“Lewis,” together with Heslin, the “Plaintiffs”) in the Texas state court action styled *Neil Heslin and Scarlett Lewis v. Alex E. Jones and Free Speech Systems, LLC*, Cause No. D-1-GN-18-001835 (the “Turnover Action”), obtained an order directing immediate turnover of all FSS assets (the “Turnover Order”). Pursuant to Texas state law, Plaintiffs filed an Application for Post-Judgment Writ of Garnishment to enforce the Turnover Order in the Texas state court action styled *Neil Heslin and Scarlett Lewis v. Cadence Bank and Alex E. Jones and Free Speech Systems, LLC*, Cause No. D-1-GN-003882 (the “Garnishment Action”).

WHEREAS, on June 24, 2024, the Trustee removed the Garnishment Action to the United States Bankruptcy Court for the Western District of Texas (“WDTX Bankruptcy Court”) under Adversary No. 1:24-ap-01035 (the “Garnishment Adversary”).

WHEREAS, Plaintiffs sought and the Trustee opposed remand of the Garnishment Adversary to the state court from which it was removed.

WHEREAS, the WDTX Bankruptcy Court entered an order transferring the Garnishment Adversary to this Court, which was docketed as Adversary Proceeding No. 24-03228.

WHEREAS, at the time the Garnishment Adversary was transferred to this Court from the WDTX Bankruptcy Court, the parties had completed all briefing relating to remand and Plaintiffs' motion seeking remand remains pending before this Court.

WHEREAS, the Trustee believes that the circumstances have changed considerably since initially filing his opposition to remand of the Garnishment Adversary.

**NOW, THEREFORE, IT IS STIPULATED AND AGREED BY THE PARTIES HERETO AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED THAT:**


1. The above recitals are incorporated by reference herein with the same force and effect as if fully set forth hereafter.
2. The Trustee's opposition to remanding the Garnishment Adversary to the state court from which it was removed is hereby withdrawn.
3. The Garnishment Adversary is remanded to the state court from which it was removed.
4. The Court retains exclusive jurisdiction over property of the Estate and any other property or interests under the control of the Trustee, including the 100% equity interest in FSS.
5. The Court retains exclusive jurisdiction to direct, instruct, or supervise the Trustee.
6. Notwithstanding anything in the Bankruptcy Code or the Bankruptcy Rules to the contrary, this *Stipulation and Agreed Order* shall be effective immediately upon the Court's approval.

7. The Court has exclusive jurisdiction and power regarding the implementation, interpretation, and enforcement of this *Stipulation and Agreed Order*.

Dated: May 5, 2025.

**IT IS SO ORDERED.**

Signed: May 27, 2025

  
\_\_\_\_\_  
Christopher Lopez  
United States Bankruptcy Judge

**AGREED AS TO FORM AND SUBSTANCE:**

/s/ Erin E. Jones

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Date Rcvd: May 27, 2025

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